

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Nicholas & Kiersten Martella	:	
	:	Chapter 13
	:	
Debtor	:	Case No18-17641JKF

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**EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY  
FREE AND CLEAR OF LIENS AND ENCUMBRANCES**

NOW INTO COURT COMES, Nicholas & Kiersten Martella, hereinafter referred to as “Debtors”, brings this Expedited Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof avers the following:

1. Debtors, filed a Motion to Sell Real Estate Free and clear of Liens on April 16<sup>th</sup>, 2019.
2. A hearing was set on said Motion for May 29<sup>th</sup>, 2019 with this Honorable Court.
3. Recently, Debtors made their Attorney aware that Debtor’s buyers now need to close the sale by May 15<sup>th</sup>, 2019, due in large part to the coordination of the necessary financing to purchase the home.
4. The Debtors do not want to lose these buyers, and the sale of the property.
5. It is therefore humbly requested that an expedited hearing be set for this Motion, on or before May 15<sup>th</sup>, 2019.

**WHEREFORE**, Debtors, respectfully request that the Court enter an Order: (i) Granting this Motion, and Granting the Debtors such other and further relief to which they may be justly entitled.

Dated: April 23, 2019

/s/Brad J. Sadek, Esq.

Attorney for Debtor  
Sadek and Cooper, LLC.  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
215-545-0008